

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

PRECISION ASSOCIATES, INC., *et al.*,

Plaintiffs,

-against-

PANALPINA WORLD TRANSPORT  
(HOLDING) LTD., *et al.*,

Defendants.

Case No. CV 08 0042-JG-VVP

**DEFENDANTS HELLMANN WORLDWIDE LOGISTICS, INC.,  
HELLMANN WORLDWIDE LOGISTICS GMBH & CO. KG AND  
HELLMANN WORLDWIDE LOGISTICS LIMITED HONG KONG'S**

**NOTICE OF MOTION FOR SUBSTITUTION OF COUNSEL PURSUANT TO  
STIPULATION AND REQUEST FOR IN CAMERA HEARING**

**PLEASE TAKE NOTICE THAT**, pursuant to Local Rule 1.4, Hellmann Worldwide Logistics, Inc., Hellmann Worldwide Logistics GmbH & Co. KG and Hellmann Worldwide Logistics Limited Hong Kong will move this Court, before the Honorable John Gleeson, United States District Judge, at the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on a date and at a time to be determined by the Court, for an Order permitting the substitution of counsel, pursuant to stipulation, as set forth below. Further, the declaration required by Local Rule 1.4 is filed separately and under seal. An in camera hearing is requested if deemed necessary by the Court.

Defendants Hellmann Worldwide Logistics, Inc., Hellmann Worldwide Logistics GmbH & Co. KG, and Hellmann Worldwide Logistics Limited Hong Kong submit the attached stipulation (Exhibit A) consenting to the substitution of counsel and request leave to allow:

Andrew Spector (ARS-3887)  
Troy Geisser (TG-9012)  
Spector Rubin, P.A.  
Continental Plaza  
3250 Mary Street, Suite 304  
Miami, Florida 33133

Who are both admitted to practice in the State of New York and admitted before the United States District Court for the Eastern District of New York, to appear as counsel for Hellmann Worldwide Logistics, Inc., Hellmann Worldwide Logistics GmbH & Co. KG, and Hellmann Worldwide Logistics Limited Hong Kong; and to grant leave for withdrawal as counsel by:

Nicholas E. Pantelopoulos (NP-4669)  
Kaplan, Massamillo & Andrews, LLC  
70 East 55th Street, 25th Floor  
New York, New York 10022

-and

Richard A. Walker (RW-4399)  
Paul H. Kuznetsky (PK-\_\_\_\_)(Pro hac vice granted, but no Notice of Appearance filed)  
Kaplan, Massamillo & Andrews, LLC  
200 West Madison Street, Suite 1600  
Chicago, Illinois 60606

Withdrawing counsel, Kaplan, Massamillo & Andrews, LLC, further request an in camera hearing regarding the reasons why substitution of counsel is required if deemed necessary by the Court.

**WHEREFORE,** Defendants HELLMANN WORLDWIDE LOGISTICS, INC., HELLMANN WORLDWIDE LOGISTICS GMBH & CO. KG and HELLMANN WORLDWIDE LOGISTICS LIMITED HONG KONG request the entry of the attached stipulation and order.

March 19, 2014

Respectfully submitted,

KAPLAN, MASSAMILLO & ANDREWS, LLC

By: /s/ Richard A. Walker

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*Attorneys for Defendants,  
Hellmann Worldwide Logistics, Inc.,  
Hellmann Worldwide Logistics GmbH Co. KG, and  
Hellmann Worldwide Logistics Limited Hong Kong*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2014, a true and correct copy of Defendants **HELLMANN WORLDWIDE LOGISTICS, INC., HELLMANN WORLDWIDE LOGISTICS GMBH & CO. KG AND HELLMANN WORLDWIDE LOGISTICS LIMITED HONG KONG'S NOTICE OF MOTION FOR SUBSTITUTION OF COUNSEL PURSUANT TO STIPULATION AND REQUEST FOR IN CAMERA HEARING, and STIPULATION AND ORDER OF SUBSTITUTION OF COUNSEL** was filed and served on all parties of record via the Court's ECF system, and to:

<i>Via email and courier</i>  Andrew Spector (ARS-3887) Troy Geisser (TG-9012) Spector Rubin, P.A. Continental Plaza 3250 Mary Street, Suite 304 Miami, Florida 33133  As successor counsel <i>Hellmann Worldwide Logistics, Inc., Hellmann Worldwide Logistics GmbH Co. KG, and Hellmann Worldwide Logistics Limited Hong Kong</i>	<i>Via email and courier</i>  Hellmann Worldwide Logistics, Inc., Hellmann Worldwide Logistics GmbH Co. KG, and Hellmann Worldwide Logistics Limited Hong Kong  c/o Andrew Spector Spector Rubin, P.A. Continental Plaza 3250 Mary Street, Suite 304 Miami, Florida 33133
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By: /s/ Richard A. Walker